

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY) MDL No. 1456
AVERAGE WHOLESALE PRICE)
LITIGATION)
THIS DOCUMENT RELATES TO ALL) CIVIL ACTION: 01-CV-12257-PBS
CLASS ACTIONS)
) Judge Patti B. Saris

DECLARATION OF MICHAEL J. BOLTON

I, Michael J. Bolton, declare as follows:

1. I am over the age of 21, under no disability, and am competent to testify to the matters contained in this verification. I make this verification in support of Baxter International Inc. and Baxter Healthcare Corporation's Opposition to Plaintiffs' Motion for Class Certification (as to the Track 2 Defendants).
2. I am currently employed as Senior Counsel for Baxter International Inc., One Baxter Parkway, Deerfield, IL 60015-4533, United States of America.
3. I have been employed by Baxter International Inc. since 1996, and have held my current title since 2001.
4. I have been authorized by Baxter International Inc. to give this verification on its behalf.
5. This verification is based upon personal knowledge following my review of records, reports and other data compilations made and kept in the ordinary course of business by Baxter International Inc., by persons with knowledge at Baxter International Inc. If called as a witness, I could and would testify competently regarding the information in this verification.

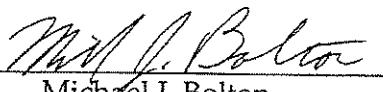
6. As counsel for Baxter International Inc. I regularly confer with officers of the company and am familiar with the manufacture, distribution, and sale of Baxter Healthcare Corporation's drugs and therapies.

7. Baxter International Inc. is a holding company that plays no role in the pricing, sales, distribution, or marketing of any drugs or therapies.

8. Baxter International Inc. has never manufactured, promoted, marketed, advertised, developed, designed, packaged, labeled, sold, distributed, or placed into the stream of commerce any pharmaceutical products in the United States.

9. I verify that the facts set forth herein are true and correct to the best of my knowledge, information, and belief.

Executed on 13 June 2006.



Michael J. Bolton